

October 24, 2003

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AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Mr. George Zerniak USEPA Region 5 77 West Jackson Blvd. AE-17J Chicago, IL 60604-3507

Subject:

Exception Report for NESHAP, Ohio EPA ID P019 and L001

Dear Mr. Zerniak:

Morgan Electro Ceramics 3 month rolling average limit for halogenated solvent usage in degreasing operations is 30.6 lb/month/sq ft surface area. Ohio EPA ID# P019, a degreaser using perchloroethylene has exceeded this limit with 124.9 lb/month/sq ft surface area for the period of 07/01/2003 to 09/30/2003. The inherent reason for the exception was due to the unit developing a seal leak. To correct this, a new unit has been purchased and will be installed after the permit process is completed. The old unit was shut down at the end of July.

Ohio EPA ID# L001, a degreaser using perchloroethylene has exceeded the 30.6 lb/month/sq ft surface area limit with a 83.8 lb/month/sq ft surface area for the period of 07/01/2003 to 09/30/2003. The inherent reason for this exception was due to the unit developing a seal leak in the heating section. A new gasket and repair materials are being evaluated in order to correct this problem.

Sincerely,

William J. Hocevar, P.E.

Facility Manager



Facility Name: Unit Name: Company I.D.:		Morgan Electro Ceramics Finishing Equipment 6342 VPD-24		EPA Facility ID: 1318031627 Ohio EPA I.D.: P019			
Month:		J	July		Year: 2003		
	_			_	RECEIV	רויטול	
	ormation	F	0.00	ا ما			
	ngth (inside):		2.92	(feet)	OCT 3 1 20)03	
	idth (inside):	53553	1.50	(feet)			
Tank Su	rface Area (s.a.):		4.38	(feet) ²	AIR ENFORCEMENT E U.S. EPA, REGIO	SKANCH, ON 5	
Solvent	Usage Information				Formulas / Notes		
1	Type Solvent Used	Pei	rchloroethylene				
2	S.G. of Solvent		1.62		[From MSDS]		
3	Solvent Density		13.51	(lb/gallon)	[From MSDS]		
4	Solvent Added		16.0	(gallon)	[From monthly log]		
5	Waste Removed		0.0	(gallon)	[From monthly log]		
6	% Solvent in waste		99.90%	(%)	[From analytical report]		
7	Solvent Removed in	waste	0.0	(gallon)	[gal. Waste] * [% solvent]		
8	Pure Solvent Remove	ed	0.0	(gallon)	[From monthly log]		
9	Total Solvent Remov	ved	0.0](gallon)	[7+8]		
10	Total Solvent Emitte	A 555	16.0	(gallon)	[4+9]		
10	Total Solvent Emitted Total Solvent Emitted		216.2	(lbs)	[10 * 3]		
11	Total Dolvont Emittee	<u> </u>](1 00)			
Monthly	y Emissions						
-	ge Solvent			-			
Emiss	sion Rate:		49.4	(lb/month/	[11 / (tank surface area)]		
1 '	ge Solvent			$ft^2 s.a.)$			
Allowable Rate:			30.6	<u></u>	From 40 CFR 63, Subpart T		
				ft ² s.a.)			
	Note: If ave. solvent				ŀ		
	If ave. solvent emissi	ion rate is > 30	0.6 lb/month/ft ² ,	Note in quar	rterly exceedance report.		
Three M	Ionth Rolling Average	e					
2.35	41 A C 1						
li e	onth Average Solvent		124.9	Tib/manth/	[Average of three previous		
'	Emission Rate:		144.7	 ' _	months solvent emission rates		
Ī				ıı s.a.J	i momins solvem emission rates		

Facility Name: Unit Name: Company I.D.:		Morgan Electro Ceramics Finishing Equipment 6342 VPD-24		EPA Facility ID: 1318031627 Ohio EPA I.D.: P019	
Month:			August		Year: 2003
Unit Information Tank Length (inside): Tank Width (inside): Tank Surface Area (s.a.):			2.92 1.50 4.38	(feet) (feet) (feet) ²	
Solvent	Usage Information				Formulas / Notes
1	Type Solvent Used		Perchloroethylene		
2	S.G. of Solvent	ļ	1.62		[From MSDS]
3	Solvent Density	1	13.51	(lb/gallon)	[From MSDS]
4 5 6 7 8 9	Solvent Added Waste Removed % Solvent in waste Solvent Removed in w Pure Solvent Removed Total Solvent Removed Total Solvent Emitted Total Solvent Emitted	d ed [0.0 0.0 99.90% 0.0 0.0 0.0	(gallon) (gallon) (%) (gallon) (gallon) (gallon) (gallon) (gallon)	[From monthly log] [From monthly log] [From analytical report] [gal. Waste] * [% solvent] [From monthly log] [7+8] [4+9] [10*3]
Monthly	y Emissions				
·····×	ge Solvent				
1	sion Rate:		0.0	(lb/month/	[11 / (tank surface area)]
Average Solvent Allowable Rate:			30.6	ft ² s.a.) [(lb/month/ ft ² s.a.)	From 40 CFR 63, Subpart T
	Note: If ave. solvent	action is required.			
	If ave. solvent emission	rterly exceedance report.			
Three N	Ionth Rolling Average				
	onth Average Solvent Emission Rate:		62.7](lb/month/ ft² s.a.)	[Average of three previous months solvent emission rates

Facility Name: Unit Name: Company I.D.:		Morgan Electro Ceramics Finishing Equipment 6342 VPD-24		EPA Facility ID: 1318031627 Ohio EPA I.D.: P019	
Month:			September]	Year: 2003
Unit Information Tank Length (inside): Tank Width (inside): Tank Surface Area (s.a.):			2.92 1.50 4.38	(feet) (feet) (feet) ²	
Solvent	Usage Information				Formulas / Notes
1	Type Solvent Used		Perchloroethylene		
2	S.G. of Solvent		1.62		[From MSDS]
3	Solvent Density		13.51	(lb/gallon)	[From MSDS]
4 5 6 7 8 9	Solvent Added Waste Removed % Solvent in waste Solvent Removed in Pure Solvent Remov Total Solvent Remov	ed	0.0 0.0 99.90% 0.0 0.0	(gallon) (gallon) (%) (gallon) (gallon) (gallon)	[From monthly log] [From monthly log] [From analytical report] [gal. Waste] * [% solvent] [From monthly log] [7 + 8]
10 11	Total Solvent Emitte Total Solvent Emitte		0.0 0.0	(gallon) (lbs)	[4+9]
Monthly	Emissions				
	ge Solvent		***************************************		
_	ion Rate:		0.0	(lb/month/	[11 / (tank surface area)]
Average Solvent Allowable Rate:		30.6	ft ² s.a.)](lb/month/ ft ² s.a.)	From 40 CFR 63, Subpart T	
	Note: If ave. solven	action is required.			
		rterly exceedance report.			
Three N	Ionth Rolling Averag				
	nth Average Solvent Emission Rate:		16.5](lb/month/	[Average of three previous months solvent emission rates

Facility Name: Unit Name: Company I.D.:		Morgan Electro Ceramics Baron Blakeslee MLR-280LE VPD-34			ecility ID: 1318031627 EPA I.D.: L001	
Month:			July		Year: 2003	
Unit Information Tank Length (inside): Tank Width (inside): Tank Surface Area (s.a.):			3.67 2.67 9.79	(feet) (feet) (feet) ²		
Solvent	Usage Information				Formulas / Notes	
1	Type Solvent Used		Perchloroethylene			
2 3	S.G. of Solvent Solvent Density		1.62 13.51	(lb/gallon)	[From MSDS] [From MSDS]	
,	Borvent Delisity			, ,		
4	Solvent Added		41.0	(gallon)	[From monthly log]	
5	Waste Removed		0.0	(gallon)	[From monthly log]	
6	% Solvent in waste		99.90%	(%)	[From analytical report]	
7	Solvent Removed in	waste	0.0	(gallon)	[gal. Waste] * [% solvent]	
8	Pure Solvent Remov	red	0.0	(gallon)	[From monthly log]	
9	Total Solvent Remo	ved	0.0	(gallon)	[7+8]	
10	Total Solvent Emitte	ed	41.0	(gallon)	$\lceil 4+9 \rceil$	
11	Total Solvent Emitte		553.9	(lbs)	[10 * 3]	
Monthly	y Emissions					
Averag	ge Solvent					
Emiss	ion Rate:		56.6	4	[11 / (tank surface area)]	
1	ge Solvent			ft^2 s.a.)		
Allowable Rate:			30.6	(lb/month/ ft ² s.a.)	From 40 CFR 63, Subpart T	
	Note: If ave. solver	-				
	If ave. solvent emiss	rterly exceedance report.				
Three N	fonth Rolling Averag					
2 3 4						
3 - Month Average Solvent			83.8	1(1b/m ant 1-/	[Avarage of three recycles	
Emission Rate:			03.0	J '	Average of three previous	
				ft ² s.a.)	months solvent emission rates	

Facility Name: Unit Name: Company I.D.:		Morgan Electro Ceramics Baron Blakeslee MLR-280LE VPD-34		EPA Facility ID: 1318031627 Ohio EPA I.D.: L001	
Month:		August		Year: 2003	
Unit Information	Ī	3.67	(feet)		
Tank Length (inside): Tank Width (inside):	ŀ	2.67	4 ` ´		
,		.,.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	(feet)		
Tank Surface Area (s.a.):		9.79	(feet) ²		
Solvent Usage Information				Formulas / Notes	
1 Type Solvent Use	d	Perchloroethylene			
2 S.G. of Solvent		1.62		[From MSDS]	
3 Solvent Density		13.51	(lb/gallon)	[From MSDS]	
0.1 4.11.1	ı		J	FT:	
4 Solvent Added		61.0	(gallon)	[From monthly log]	
5 Waste Removed		32.0	(gallon)	[From monthly log]	
6 % Solvent in wast		99.90%	(%)	[From analytical report]	
7 Solvent Removed		32.0	(gallon)	[gal. Waste] * [% solvent]	
8 Pure Solvent Rem		0.0	(gallon)	[From monthly log]	
9 Total Solvent Ren	noved	32.0	(gallon)	[7+8]	
10 Total Solvent Emi	itted	29.0	(gallon)	[4+9]	
11 Total Solvent Emi	itted	392.2	(lbs)	[10 * 3]	
Monthly Emissions					
Average Solvent			J an () a		
Emission Rate:		40.1	(lb/month/	[11 / (tank surface area)]	
Average Solvent	1		ft^2 s.a.)		
Allowable Rate:		30.6](lb/month/ ft ² s.a.)	From 40 CFR 63, Subpart T	
Note: If ave. solv					
	terly exceedance report.				
Three Month Rolling Aver					
3 - Month Average Solven	t	(7 3	7.71		
Emission Rate:		67.2	_	[Average of three previous	
			ft ² s.a.)	months solvent emission rates	

Facility Name: Unit Name: Company I.D.:		Morgan Electro Ceramics Baron Blakeslee MLR-280LE VPD-34			eility ID: 1318031627 EPA I.D.: L001
Month:			September		Year: 2003
Unit Inf	Cormation				
Tank Le	ngth (inside):		3.67	(feet)	
Tank Wi	idth (inside):		2.67	(feet)	
Tank Su	rface Area (s.a.):		9.79	(feet) ²	
Solvent	Usage Information				Formulas / Notes
1	Type Solvent Used		Perchloroethylene		
2	S.G. of Solvent		1.62		[From MSDS]
3	Solvent Density		13.51	(lb/gallon)	[From MSDS]
4	Solvent Added		24.0	(gallon)	[From monthly log]
5	Waste Removed		0.0	(gallon)	[From monthly log]
6	% Solvent in waste		99.90%	(%)	[From analytical report]
7	Solvent Removed in	waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Remov	ved	0.0	(gallon)	[From monthly log]
9	Total Solvent Remo	ved	0.0	(gallon)	[7+8]
			-	-	
10	Total Solvent Emitte	ed	24.0	(gallon)	[4+9]
11	Total Solvent Emitte	ed	324.3	(lbs)	[10 * 3]
Monthly	y Emissions				
	ge Solvent				
1	sion Rate:		33.1	(lb/month/	[11 / (tank surface area)]
Avera	ge Solvent			ft ² s.a.)	
Allowable Rate:			30.6		From 40 CFR 63, Subpart T
				ft ² s.a.)	
	Note: If ave. solver	nt emission	rate is < 30.6 lb/mor	-	action is required.
	If ave. solvent emiss	rterly exceedance report.			
Three N	Ionth Rolling Averag				
3 - Mc	onth Average Solvent				
	Emission Rate:		43.3](lb/month/	[Average of three previous
				ft ² s.a.)	months solvent emission rates